

EXHIBIT 16

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION,

Plaintiff,

v.

FEDERAL INSURANCE COMPANY, and
ACE AMERICAN INSURANCE COMPANY

Defendants.

Case No. 16-CV-1054(WMW/DTS)

**EXPERT REPORT OF
NEIL J. ZOLTOWSKI
WITH RESPECT TO DAMAGES**

Respectfully submitted this 19th day of April, 2019

A handwritten signature in black ink, appearing to read "Neil J. Zoltowski", is written over a horizontal line.

CONFIDENTIAL – ATTORNEYS’ EYES ONLY

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 10.1: Summary of Domestic Gross Written Premiums by Application - All Writing Companies (a)**

Application	Mar 31 - Dec 31		Jan - Mar		Total
	2016 (b)	2017	2018	2019 (c)	
Commercial Underwriting Workstation (CUW)	\$ 5,760,264,882	\$ 8,644,996,927	\$ 6,286,537,639	\$ 691,647,184	\$ 21,383,446,632
CSI eXPRESS (d)	1,153,503,582	1,462,910,856	1,406,041,568	302,773,970	4,325,229,977
Premium Booking	380,416,844	442,839,932	500,850,829	-	1,324,107,605
Texas Accident Prevention System (TAPS)	215,420,480	252,219,200	216,490,943	8,252,058	692,382,681
Cornerstone	179,418,382	259,641,112	137,058,166	-	576,117,660
Individual Rate Modification Application (IRMA)	79,544,410	99,688,772	92,641,984	-	271,875,166
Decision Point	2,680,739	4,319,856	4,814,338	1,347,731	13,162,664
TOTAL	\$ 7,771,249,319	\$ 11,166,616,655	\$ 8,644,435,467	\$ 1,004,020,943	\$ 28,586,322,385

Note/Source(s):

- (a) This schedule includes gross written premiums from all writing companies reported per Defendants' interrogatory responses. See **Schedule 12.0**.
- (b) I understand that copyright remedies start at the termination date of the SLM Agreement (i.e., March 31, 2016) for the domestic applications. I have adjusted the gross written premiums accordingly. (FED004437_0001.)
- (c) The Defendant's most recent responses to Interrogatory Nos. 16-20 were dated March 2, 2019 and March 21, 2019.
- (d) I understand the gross written premiums reported for CSI eXPRESS includes premiums related to the Automated Renewals Process and Profitability Indicator applications. Further, CSI eXPRESS, Automated Renewals Process and Profitability Indicator are all used in connection with the same gross written premium policies. (Harkin Deposition at 72-74; Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 16 and Sixth Supplemental Answer to Plaintiff's Interrogatory No. 17, dated March 21, 2019 at 3-5, 11-13.)